

EXHIBIT 2

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June 19, 2018

By email

John S. Hooks, Esq.
Adams and Reese, LLP
111 E. Capital Street, Suite 350
Jackson, MS 39225

RE: *Barnhardt v. Meridian Mun. Separate Sch. Dist., et. al.*, C.A. No. 4:65-cv-01300-HTW-LRA-1300(E) (S.D. Miss.)

Dear Counsel:

On behalf of the Private Plaintiffs, the NAACP Legal Defense and Educational Fund, Inc. (“LDF”) writes to submit the following information requests regarding Meridian Municipal Separate School District’s (“District”) compliance with its desegregation obligations.

1. Percentage of students at each school with free and reduced-price lunch (“FRL”), broken down by race, from school year (“SY”) 2015-2016 to present.
2. Definition of economic disadvantage utilized by District. Provide percentage of students at each school determined to be economically disadvantaged by District, broken down by race, from SY 2015-2016 to present.
3. Excel spreadsheet, in native format, showing scores of Advanced Placement (“AP”) student test takers by race.
4. Confirm whether the document titled “Retentions June 2016,” produced July 2016, reflects retention data for SY 2015-2016 in its entirety.
5. For SY 2016-2017 and SY 2017-2018, an Excel spreadsheet, in native format, showing retention data. If the document titled “Retention 2016,” does not reflect retention data for SY 2015-2016, provide that data.
6. An Excel spreadsheet, in native format, showing cohort graduation data beginning SY 2015-2016 to present.
7. Narrative explanation for why the District hired new faculty on an “emergency basis,” as reflected in document titled “LDF Request II.B – Supplement.XLSX” produced on February 27, 2018.

8. Teacher quality metrics by school for SY 2015-2016 through present, including counts of both experienced faculty (with at least three years of experience) and novice teachers (with less than three years of experience), in which subject areas they are certified and in which school they are located.
9. For the document titled “DOJ Request IV Transportation – C” produced August 2017, identify the destination for each bus number and the school year associated with the document.

In reviewing the excel spreadsheets reflecting discipline data provided by the District, there are a number of abbreviations for which LDF could not locate a definition. Provide definitions for the following infractions:

- a. “Comp abuse L2”
- b. “Def/con non com L2”
- c. “Def/con non comp L2”
- d. “Del False Charge Ag”
- e. “Eng in ser ret ag sc”
- f. “Har not sex 2 ad L4”
- g. “Har not sex 2ad L4”
- h. “Har or Intim Communi”
- i. “Har oth that sex adu”
- j. “Int AUP Vio”
- k. “Internet AUP Vio”
- l. “Missing Assign Disc”
- m. “Oth than Sexual”
- n. “Pro/Obs Com Dir At”
- o. “Re dis for au v L2”
- p. “Rep dis auth v L2”
- q. “Rep Prof/obs com ndi”

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r. "Ser Bodily Injury"

Thank you again for your cooperation and assistance. Please send your responses to us via email at nmerle@naacpldf.org and kjohnson@naacpldf.org. Should you have any questions, please contact us at (212) 965-2200.

Regards,

A handwritten signature in blue ink that reads "Natasha Merle". The signature is fluid and cursive, with the first name "Natasha" and last name "Merle" clearly distinguishable.

Natasha C. Merle
Kristen A. Johnson
NAACP Legal Defense and Educational Fund, Inc.

cc: Natane Singleton
Aria Vaughan
U.S. Department of Justice
Civil Rights Division
Educational Opportunities Section